

ROCKETED

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

BALLY MANUFACTURING CORPORATION,)

Plaintiff,)

v.)

D. GOTTLIEB & Co., a corporation and)
WILLIAMS ELECTRONICS, INC.,)
a corporation,)

Defendants.)

1979 FEB 21 PM 4 33

CIVIL ACTION

NO. 78C 2246

NOTICE OF DEPOSITION

To: Donald L. Welsh, Esq.
Fitch, Even, Tabin & Luedeka
135 S. LaSalle Street
Chicago, Illinois 60603

Melvin M. Goldenberg, Esq.
McDougall, Hersch & Scott
135 South LaSalle Street
Chicago, Illinois 60602

Please take notice that the attorneys for Defendant,
D. Gottlieb & Co., will take the deposition upon oral examination of:
RAMTEK CORPORATION, 585 North Mary Avenue, Sunnyvale, California
94086 and its employees Charles McEwan, Gaymond W. Schultz, Tom
Adams, Melvin McEwan, Ken Agard, Wanda Lewis, Ron Cushman,
Mike Bernett, Jeri Pettigrew, Mac Copas and perhaps other employees
who are identified in the course of testimony. The deposition will
commence at 10:00 a. m., February 20, 1979 at the office of RAMTEK
CORPORATION identified above and may be adjourned to the Games
Division office of RAMTEK CORPORATION at 292 Commercial Street,
Sunnyvale, California 94086, such depositions to continue from day to
day until complete.

Furthermore, please take notice that Defendant, D. Gottlieb & Co., shall cause the U.S. District Court for the Northern District of California to issue a subpoena duces tecum commanding the witnesses to produce documents falling in the categories set out in Exhibit A attached hereto.

Date: _____

12/21/78

C. Oslakovic

Leroy W. Mitchell
Charles S. Oslakovic
Dale Lischer
Leydig, Voit, Osann, Mayer & Holt, Ltd.
815 North Church Street
Rockford, Illinois 61103
815/963-7661
ATTORNEYS FOR DEFENDANT,
D. Gottlieb & Co.

CERTIFICATE OF SERVICE

This is to certify that the foregoing Notice of Deposition was served upon Plaintiff Bally and Defendant Williams by hand-delivery a copy, with Exhibit A attached, to their respective attorneys at the addresses set out in such Notice this 21st day of Dec, 1978.

C. Oslakovic

EXHIBIT A

1. All documents which refer to or relate to the creation, construction, testing, demonstrations and communications concerning a pinball game now known as LUCKY DICE, --including without limitation notes, descriptions, drawings, circuit diagrams, drawing logs, correspondence, memos, purchase orders for parts, reference materials (e.g., Intel chip data sheets), flow charts, program listings, personnel time records, invoices for services or parts, and financial studies or analyses; and in particular (i) the conception, (ii) work toward reduction to practice of the first prototype, and (iii) reduction to practice and successful operation of the first prototype or physical embodiment.
2. All physical parts and components of the pinball game which came to be called LUCKY DICE, including any simulators or other physical units made for special use in the development of said game.
3. All notes, drafts, papers and other documents which relate to an IEEE Conference held at Asilomar, California on or about APRIL 30, 1975 1975 or to the attendance at or participation by any RAMTEK officer, employee or agent in said conference.
4. All notes, correspondence, travel records, memoranda, analyses and other records which constitute, relate to or refer to either (a) written or oral communications between RAMTEK officers, employees or representatives and any individuals or entities outside of the RAMTEK organization as to the RAMTEK plans for and work on designing, and the

existence of, a pinball game which would or did include, inter alia, a microprocessor; or (b) demonstrations of a pinball game known as LUCKY DICE to individuals or entities outside of the RAMTEK organization --including by way of example and without limitation, disclosures, correspondence, oral discussions or physical demonstrations with or to representatives of Bally Manufacturing Corp. or any of its subsidiaries.